IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ART+COM Innovationpool GmbH,)	
Plaintiff,)	C.A. No. 14-cv-217-TBD
VS.)	DEMAND FOR JURY TRIAL
)	
GOOGLE INC.,)	
Defendant.)	

SUBMISSION REGARDING TECHNICAL TUTORIAL MATERIALS

Subsequent to the hearing before the Court on Monday, May 2nd, counsel for both parties agreed to provide the Court with the technical background sections of the technical expert reports for both parties – Dr. Castleman for Art+Com and Dr. Goodchild for Google. Those background sections are attached as Exhibit A and B, respectively.

The parties disagree about whether the Court requested the parties to take any further action until it has an opportunity to review the foregoing materials.

Because of Your Honor's recent assignment to the case, Google believes it would be helpful to provide additional technical background at the pre-trial conference or another time convenient to the Court. Specifically, Google proposes that each side's attorneys be allowed to present a 20-minute tutorial regarding relevant technology that is not fully covered in the submitted sections of the expert report.

As Art+Com indicated during Monday's hearing, it believes the Court should first have the opportunity to review the technology background provided by the two technical experts, and if the Court finds that sufficient for its purposes together with the patent at issue, then no further action by the parties would be required. In the absence of any previously prepared technology tutorial, Art+Com prefers to focus the pretrial conference on the outstanding trial issues. However, if the Court determines that an additional tutorial is needed, of course Art+Com is willing to assist the Court by participating in such a tutorial.

Dated: May 4, 2016

FARNAN LLP

/s/ Michael J. Farnan

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Respectfully submitted,

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